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Attorney for Defendant
KEINO BRUCE

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. 22-CR-00058-DAD
)	
Plaintiff,)	
)	PROPOSED ORDER REGARDING
v.)	AMENDING SPECIAL CONDITIONS OF
)	PRETRIAL RELEASE
)	
KEINO BRUCE,)	
)	Date: n/a
)	Time: n/a
)	Judge: Honorable Jeremy D. Peterson
Defendants.)	
)	
)	

Defendant, KEINO BRUCE, by and through counsel, seeks to amend the Court's previously issued Pretrial Release Order issued by the Hon. Deborah Barnes on January 3, 2023.

United States Pretrial Services officer, Stephanie Mott, recently contacted counsel and inquired about amending Mr. Bruce's release conditions to add conditions thirteen and fourteen due to some medical developments for Mr. Bruce. AUSA Alexis Klein indicated that she joins in that request. On Mr. Bruce's behalf, counsel humbly requests that new conditions #13 – "You must participate in a program of medical or psychiatric treatment, including treatment for drug or alcohol dependency, as approved by the pretrial services officer. You must pay all or

part of the costs of the counseling services based upon your ability to pay, as determined by the pretrial services officer;" and #14 – "You are released to the third-party custody of your mother, Ollie Bruce," be added to the original release terms.

Attached as Exhibit A to this pleading are the new Amended Special Conditions of Release. Kyle Knapp, attorney for defendant, KEINO BRUCE, asks that the attached Amended Special Conditions of Release be adopted.

IT IS HEREBY STIPULATED between the United States of America through its undersigned counsel, Alexis Klein, Assistant United States Attorney, attorneys for plaintiff and Kyle Knapp, Attorney for defendant, Keino Bruce, that his amended Special Conditions of Release (Exhibit A) be adopted.

All other terms and conditions of release would remain in place.

IT IS SO STIPULATED

Dated: February 27, 2023

PHILLIP A. TALBERT
UNITED STATES ATTORNEY
/s/ Alexis Klein
Alexis Klein
Assistant United States Attorney
Attorney for Plaintiff

Dated: February 27, 2023

/s/ Kyle R. Knapp
KYLE KNAPP
Attorney for Defendant
KEINO BRUCE

~~PROPOSED~~ ORDER

The request to amend Mr. BRUCE's release conditions is GRANTED, and the Amended Special Conditions of Release for Mr. BRUCE are hereby adopted.

IT IS SO ORDERED.

Dated: February 28, 2023



HON. JEREMY D. PETERSON
United States Magistrate Judge

EXHIBIT A

SPECIAL CONDITIONS OF RELEASE

Re: BRUCE, Keino

Case No.: 2:22-CR-00058-DAD

Date: January 3, 2023

1. You must report to and comply with the rules and regulations of Pretrial Services;
2. You must report in person to the Pretrial Services office on the first working day following your release from custody;
3. You must reside at a location approved by the pretrial services officer and not move or absent yourself from this residence for more than 24 hours without the prior approval of the pretrial services officer;
4. You must cooperate in the collection of a DNA sample if asked to do so;
5. You must restrict your travel to the Central District of California (for the month of January 2023 only), the Eastern District of California (for court purposes), and the Middle District of Florida, unless otherwise approved in advance by Pretrial Services;
6. You must not possess, have in your residence, or have access to a firearm/ammunition, destructive device, or other dangerous weapon; additionally, you must provide written proof of divestment of all firearms/ammunition currently under your control;
7. You must refrain from **excessive** use of alcohol and **any** use of a narcotic drug or other controlled substance without a prescription by a licensed medical practitioner; and you must notify Pretrial Services immediately of any prescribed medication(s). However, medicinal marijuana prescribed and/or recommended may not be used;
8. You must submit to drug testing as approved by the pretrial services officer. You must pay all or part of the costs of the testing services based upon your ability to pay, as determined by the pretrial services officer;
9. You must seek and/or maintain employment and provide proof of same as requested by your pretrial services officer;
10. You must surrender your passport to the Clerk of Courts by no later than January 10, 2023; and you must not apply for or obtain a passport or any other travel documents during the pendency of this case;

- 1 11. You must not associate or have any contact with any codefendants in your case unless in
2 the presence of counsel or otherwise approved in advance by the pretrial services officer;
3 and
- 4 12. You must report any contact with law enforcement to your pretrial services officer within
5 24 hours.
- 6 13. You must participate in a program of medical or psychiatric treatment, including
7 treatment for drug or alcohol dependency, as approved by the pretrial services officer.
8 You must pay all or part of the costs of the counseling services based upon your ability to
9 pay, as determined by the pretrial services officer.
- 10 14. You are released to the third-party custody of your mother, Ollie Bruce.